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REMARKS

This is a full and timely response to the non-final Official Action mailed September 19, 2006. Reconsideration of the application in light of the above amendments and the following remarks is respectfully requested.

Claim Status:

Claims 10-22 and 31-34 were withdrawn from consideration under a previous Restriction Requirement and subsequently cancelled without prejudice or disclaimer. Thus, claims 1-9, 23-30 and 35-40 are currently pending for further action.

Drawings:

The recent Office Action objected to the drawings under 37 C.F.R. § 1.83(a) as failing to show the “the support structure comprising a rod and potential coupler comprisi[ng] a wire running along the rod” as recited in claim 39. (Action of 9/19/06, p. 2). This objection is respectfully traversed for at least the following reasons.

Figure 1 illustrates a potential coupler (150). As described in Applicant’s specification, at paragraph 0020, “the potential coupler (150) may include a wire coupled to a support structure for holding the startup element in place. The support structure may be a thin rod of metal of sufficient stiffness to support the wire.” Thus, the claimed support structure comprising a rod and wire are illustrated and represented in the drawings by the potential coupler (150). The potential coupler (150) is shown in Figs. 1-2B and represents a variety of different embodiments disclosed in Applicant’s specification and covered by Applicant’s claims. Applicant believes this is adequate illustration of the claimed subject matter.

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Consequently, the drawings as originally filed illustrate all the claimed subject matter as required by 37 C.F.R. § 1.83(a), including the element that supports the startup element and provides a potential to the startup element. Therefore, the objection to the drawings should be reconsidered and withdrawn.

Prior Art:

With regard to the prior art, claims 1, 2, 4-8, 23-29, 35 and 36 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of U.S. Patent No. 6,505,958 to Ooms et al. ("Ooms") and U.S. Patent No. 5,010,455 to Luallin et al. ("Luallin"). For at least the following reasons, this rejection is respectfully traversed.

Claim 1 recites:

A reflector assembly for use in a digital projector, comprising:
a reflector including a reflector opening, and
a startup element *permanently coupled* to said reflector, wherein said reflector and said startup element are configured to allow a replaceable coupling of a lamp assembly to said reflector assembly.
(Emphasis added).

Support for the amendment to claim 1 can be found in Applicant's originally-filed specification at, for example, paragraph 0019.

Applicant notes that claim 1 recites a "reflector assembly," not a lamp assembly, that includes a startup element. The reflector assembly claimed is configured to allow a replaceable coupling with a lamp assembly.

According to the Office Action, Ooms teaches "a startup element (starting aid) 31 fixedly coupled (through a connection conductor 34 which passes through a [sic] opening 35 and connected to the contact member 29 provided on the reflector) to the reflector 2." (Action of 9/19/06, page 3). However, Ooms does not teach or suggest a startup element that

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is part of a reflector assembly, *rather than* part of a lamp assembly as claimed. More specifically, Ooms does not teach or suggest a startup element that is "permanently coupled" to a reflector to form a reflector assembly as claimed.

Ooms teaches a "starting aid 31" that "comprises an external antenna 33 ... The antenna 33 is wound a few turns around the second end portion 15 [of a lamp vessel 11]." (Ooms, col. 4, lines 27-31; *see also* Ooms, col. 3, lines 59-60). Thus, Ooms teaches a "starting aid" that is disposed on, wrapped around and supported by a lamp assembly.

Moreover, the antenna (33) taught by Ooms is not *permanently* coupled to the reflector, as claimed. Rather, the antenna (33) taught by Ooms "comprises a connection conductor 34 which is passed through a further opening 35 in the reflector portion 2 and is connected to the further contact member 29 provided on the outer surface 23." (Ooms, col. 4, lines 31-34). Thus, the connection conductor (34) of the antenna (33) passes through a hole (35) in the reflector (2) rather than being coupled to the reflector (2).

As seen in Fig. 2 of Ooms, this connection (34) must be broken if the lamp assembly is removed from within the reflector. Consequently, Ooms does not teach or suggest the claimed "startup element *permanently* coupled to said reflector." (Emphasis added).

Luallin fails to remedy these deficiencies of Ooms. Luallin does not teach or suggest a startup element for a lamp, but is merely cited as teaching a replaceable lamp assembly. (Office Action of 9/19/06, p. 4).

Consequently, the combination of Ooms and Luallin fails to teach or suggest the claimed "a startup element permanently coupled to said reflector, wherein said reflector and said startup element are configured to allow a replaceable coupling of a lamp assembly to said reflector assembly." "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180

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USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least this reason, the rejection of claim 1 and its dependent claims based on Ooms and Luallin should be reconsidered and withdrawn.

Independent claim 23 recites:

A method of forming a reflector assembly used in digital projectors, comprising:
affixing a startup element to a reflector such that said startup element is supported at a predetermined location within said reflector prior to coupling of a lamp assembly with said reflector assembly; and
coupling a latching assembly to an opening defined in said reflector wherein said startup element and said latching assembly cooperate to allow replaceable coupling of a lamp assembly to said reflector assembly.
(Emphasis added).

Support for the amendment to claim 23 can be found in Applicant's originally-filed specification at, for example, paragraph 0020.

In contrast, the combination of Ooms and Luallin fails to teach or suggest "affixing a startup element to a reflector such that said startup element is supported at a predetermined location within said reflector prior to coupling of a lamp assembly with said reflector assembly." As described above, the combination of Ooms and Luallin teaches an antenna (33) that is disposed on a lamp (10). The antenna (33) is not supported within the reflector at a predetermined location prior to the coupling of the lamp assembly with the reflector assembly as claimed.

Again, "[t]o establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least this reason, the rejection of claim 23 and its dependent claims based on Ooms and Luallin should be reconsidered and withdrawn.

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Independent claim 35 recites:

A reflector assembly for use in a digital projector, comprising:
a reflector including a reflector opening,
a startup element fixedly coupled to said reflector,
a support structure, separate from a lamp assembly, for fixedly coupling said startup element to said reflector, said support structure being coupled to said reflector and to said startup element to support said startup element within said reflector,
wherein said startup element is configured to receive a portion of a lamp assembly that is removably coupled to said reflector assembly.
(Emphasis added).

Support for the amendment to claim 35 can be found in Applicant's originally-filed specification at, for example, paragraph 0020.

In contrast, as amply demonstrated above, the combination of Ooms and Luallin fails to teach or suggest any support structure, separate from a lamp assembly, for fixedly coupling said startup element to said reflector such that the lamp assembly can be removably coupled to the reflector assembly. The antenna (33) taught by Ooms is disposed on and is entirely supported by the lamp vessel (11).

Again, "[t]o establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least this reason, the rejection of claim 35 and its dependent claims based on Ooms and Luallin should be reconsidered and withdrawn.

Additionally, the various dependent claims of the application recite further subject matter that is clearly patentable over the prior art of record. Specific examples follow.

Dependent claim 5 recites "a structural element coupled to said reflector and said startup element; wherein said potential coupler runs along said structural element." Claim 26 recites similar subject matter. As demonstrated above, the combination of Ooms and Luallin

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fails to teach or suggest the claimed structural element along which a potential coupler runs, as claimed. For at least this reason, the rejection of claims 5 and 26 should be reconsidered and withdrawn.

Dependent claim 6 recites "wherein [a] potential coupler comprises a structural element for supporting said startup element." Claim 27 recites similar subject matter. In contrast, Ooms and Luallin fail to teach or suggest the claimed potential coupler that includes a structural element for supporting the startup element. For at least this reason, the rejection of claims 6 and 27 should be reconsidered and withdrawn.

Claims 3 and 37 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings Ooms, Luallin and U.S. Patent No. 3,733,599 to Fantozzi. Claims 9 and 30 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings Ooms, Luallin and U.S. Patent No. 6,078,128 to Gagnon et al. These rejections are respectfully traversed for at least the same reasons given above with respect to independent claims 1, 23 and 35.

Claim 39 was rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings Ooms, Luallin and U.S. Patent No. 4,213,170 to Kimball et al. ("Kimball"). This rejection is respectfully traversed for at least the following reasons.

Claim 39 recites: "The assembly of claim 38, wherein said support structure comprises a rod and said potential coupler comprises a wire running along said rod," the support structure supporting a startup element.

The recent Office Action concedes that Ooms and Luallin fail to teach or suggest the claimed support structure comprising a rod and a potential coupler comprising a wire running

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along the rod. (Action of 9/19/06, p. 8). Consequently, the Action cites to Kimball in this regard. (*Id.*). However, Kimball does not teach or suggest a startup element for a lamp and, therefore, cannot teach or suggest the claimed support structure for a startup element where the support structure comprises a rod with a potential coupler comprising a wire running along the rod.

As cited in the recent Office Action, Kimball teaches that

Tungsten-halogen lamp 1 is double-ended, of the type shown in U.S. Pat. No. 3,242,372, for example, and is supported in parabolic reflector 2 by means of two support rods 3. Support rods 3 are connected to lead-in wires 4 at the ends of lamp 1 and to metal ferrules 5 which are glass-to-metal sealed to the back of reflector 2. At the front of reflector 2 is a transparent glass lens 6 which transmits the light emitted by lamp 1. (Kimball, col. 1, lines 21-30).

Thus, the support rods described in Kimball support a double-ended lamp. The lead-in wires taught by Kimball power the lamp and have nothing to do with a potential coupler for a startup element. Consequently, no prior art reference cited teaches or suggests the claimed support structure for a startup element that comprises a rod with a potential coupler for the startup element comprising a wire running along the rod as claimed.

"To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least these reasons, the rejection of claim 39 should be reconsidered and withdrawn.

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Conclusion:

For the foregoing reasons, the present application is thought to be clearly in condition for allowance. Accordingly, favorable reconsideration of the application in light of these remarks is courteously solicited. If the Examiner has any comments or suggestions which could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the number listed below.

Respectfully submitted,



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